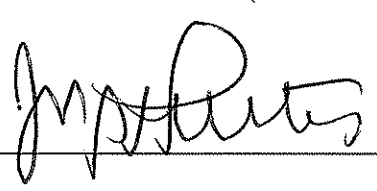


ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)		
PLAINTIFFS MAYAGUEZ MEDICAL CENTER DR. RAMÓN E. BETANCES, INC.	DEFENDANTS MEDICAL EDUCATIONAL AND HEALTH SERVICE, INC.			
ATTORNEYS (Firm Name, Address, and Telephone No.) PIETRANTONI MENDEZ & ALVAREZ LLP Banco Popular Center, 19th Floor 209 Muñoz Rivera Avenue San Juan, PR 00921	ATTORNEYS (If Known) RAFAEL GONZALEZ VELEZ 1806 McCleary St., Suite 1-B Ocean Park San Juan, PR 00911-1321			
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	PARTY (Check One Box Only) <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee			
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) Declaratory Judgment, Collection of Monies and Injunctive Relief				
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)				
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div> </td> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input checked="" type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case) </td> </tr> </table>			FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input checked="" type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input checked="" type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)			
<input type="checkbox"/> Check if this case involves a substantive issue of state law		<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23		
<input type="checkbox"/> Check if a jury trial is demanded in complaint		Demand \$		
Other Relief Sought				

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR MEDICAL EDUCATIONAL AND HEALTH SERVICE, INC.		BANKRUPTCY CASE NO. 10-04905 BKT
DISTRICT IN WHICH CASE IS PENDING PUERTO RICO	DIVISION OFFICE	NAME OF JUDGE Brian K. Tester
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) 		
DATE August 24, 2010		PRINT NAME OF ATTORNEY (OR PLAINTIFF) Jorge I. Peirats

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 104, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 104 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

MEDICAL EDUCATIONAL AND HEALTH
SERVICE, INC.

Debtor

Case No. 10-04905-BKT

CHAPTER 11

MAYAGÜEZ MEDICAL CENTER-DR.
RAMÓN EMETERIO BETANCES, INC.

Plaintiff

v.

MEDICAL EDUCATIONAL AND HEALTH
SERVICE, INC.

Defendant

Adversary No.

Declaratory Judgment, Collection of Monies
and Injunctive Relief

COMPLAINT

TO THE HONORABLE BRIAN K. TESTER
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Mayagüez Medical Center-Dr. Ramón Emeterio Betances, Inc. ("MMC"), through its undersigned counsel and respectfully complains against Medical Educational and Health Service, Inc ("Debtor or MEDHS") as follows:

1. Plaintiff is a corporation organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Mayagüez, Puerto Rico.
2. MEDHS is the debtor of the captioned Chapter 11 proceeding before this Court.
3. This is an action arising under Title 11 of the United States Code, arising in and relating to the captioned Chapter 11 proceeding. This Court has jurisdiction pursuant to 28 U.S.C. section 1334. This is a core proceeding under 28 U.S.C section 157(b)(2).

4. Venue is proper in this District.

5. This action involves an actual case and controversy concerning the rights of the parties under 28 U.S.C. section 2201. It also involves a request for collection of monies and permanent injunctive relief.

6. The Municipality of Mayagüez is the owner of the Ramón Emeterio Betances Medical Center (the "Hospital") located in Mayagüez, Puerto Rico.

7. Pursuant to an Operation and Administration Agreement dated August 27, 2009 (the "First Lease Agreement") entered into by and between the Municipality of Mayagüez and Sistemas Integrados de Salud del Sur-Oeste, Inc. ("SISSO") and Debtor, SISSO became the administrator of the Hospital.

8. SISSO in turn entered into a sub lease n agreement with Debtor dated September 1, 2009 to sublease, administer, and operate the Hospital (the "Sub-Lease Agreement").

9. On January 28, 2010, the Municipality of Mayagüez terminated the First Lease Agreement effective on that same date.

10. SISSO accepted the termination of the First Lease Agreement and returned the possession of the Hospital to the Municipality of Mayagüez on January 29, 2010.

11. The Municipality of Mayagüez entered into another Operation and Administration Agreement, this one dated January 29, 2010 with MMC (the "Existing Lease Agreement").

12. Notwithstanding the termination of the First Lease Agreement by the Municipality of Mayagüez, Debtor continued to act as operator and administrator of the Hospital.

13. MMC and SISSO notified Debtor that the Sub-Lease Agreement terminated by operation of law on January 28, 2010 when the Municipality of Mayagüez terminated the First Lease Agreement.

14. Again notwithstanding the aforesaid, Debtor continues to act as administrator and operator of the Hospital.

15. MMC requests that this Court declare that the Sub-Lease Agreement was terminated effective January 29, 2010 and that Debtor is not the operator or administrator of the Hospital, effective January 29, 2010, and that any and all acts undertaken by Debtor after that date as purported administrator and operator do not bind the Hospital.

16. MMC requests that Debtor turn over to MMC any and all payments received by Debtor from tenants or from any other individual or entity for any other purpose related to the operation and administration of the Hospital from January 29, 2010 to date.

17. Consequently, MMC further requests that this Court enjoin Debtor from continuing to represent itself or act in any way as operator and administrator of the Hospital.

WHEREFORE, MMC respectfully requests this Honorable Court to enter judgment against Debtor as follows:

- a. declaring that the Sub-Lease Agreement was terminated by operation of law effective January 29, 2010;
- b. declaring that Debtor is not the operator or administrator of the Hospital, effective January 29, 2010;
- c. declaring that any and all acts undertaken by Debtor after that date as purported lessee, administrator and operator do not bind the Hospital or MMC;
- d. ordering Debtor to turn over to MMC any and all payments received by Debtor from tenants or from any other individual or entity for any other purpose related to the leasing, operation and administration of the Hospital from January 29, 2010 to date;

- e. enjoining Debtor from continuing to represent itself or act in any way as lessor, operator and administrator of the Hospital;
- f. entering any other relief which is just and fair;
- g. awarding costs and attorney's fees against Debtor and in MMC's favor.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of August, 2010.

I hereby certify that on this date a true and exact copy of the foregoing document has been filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the entities or persons registered in the system.

S/ JORGE I. PEIRATS

Jorge I. Peirats

USDC No. 201409

PIETRANTONI MENDEZ & ALVAREZ LLP

Banco Popular Center, 19th Floor

209 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918

Telephone: (787) 274-1212

Facsimile: (787) 274-1470

jpeirats@pmalaw.com

